

Message

From: Thompson, Lisa [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C4FE265551504398A47A9049EBA0AA13-THOMPSON, L]
Sent: 3/8/2018 5:56:41 PM
To: Karen Marsh (Marsh.Karen@epa.gov) [Marsh.Karen@epa.gov]
Subject: RE: API Leak Monitoring Data Analysis in Support of EPA's Reconsideration of the New Source Performance Standards for the Oil and Natural Gas Sector

Can you let me know if you talk to David about this changing our approach / deadline / etc? Thanks!

From: Cozzie, David
Sent: Thursday, March 8, 2018 12:06 PM
To: Marsh, Karen <Marsh.Karen@epa.gov>; Thompson, Lisa <Thompson.Lisa@epa.gov>; Witt, Jon <Witt.Jon@epa.gov>; Witosky, Matthew <Witosky.Matthew@epa.gov>
Subject: Fwd: API Leak Monitoring Data Analysis in Support of EPA's Reconsideration of the New Source Performance Standards for the Oil and Natural Gas Sector

Sent from my iPhone

Begin forwarded message:

From: Matthew Todd <ToddM@api.org>
Date: March 8, 2018 at 11:55:11 AM EST
To: "David Cozzie (cozzie.david@epa.gov)" <cozzie.david@epa.gov>
Cc: "Grover Campbell (grover.campbell@dv.com)" <grover.campbell@dv.com>, "Angela Zivkovich (Angela.Zivkovich@anadarko.com)" <Angela.Zivkovich@anadarko.com>
Subject: FW: API Leak Monitoring Data Analysis in Support of EPA's Reconsideration of the New Source Performance Standards for the Oil and Natural Gas Sector

David,

Following submittal of our February 22 letter, EPA requested the data that was used to develop our analysis. Please see the attached spreadsheet which includes the data. I'm happy to arrange a follow up conference call or webinar to review and discuss any additional questions you or your staff might have. Please let me know if you'd like me to arrange one.

Thanks,

Matt

From: Matthew Todd
Sent: Thursday, February 22, 2018 2:38 PM
To: Peter Tsirigotis (tsirigotis.peter@epa.gov) <tsirigotis.peter@epa.gov>
Cc: Mandy Gunasekara (gunasekara.mandy@epa.gov) <gunasekara.mandy@epa.gov>; Penny Lassiter (lassiter.penny@epa.gov) <lassiter.penny@epa.gov>; David Cozzie (cozzie.david@epa.gov) <cozzie.david@epa.gov>
Subject: API Leak Monitoring Data Analysis in Support of EPA's Reconsideration of the New Source Performance Standards for the Oil and Natural Gas Sector
Importance: High

Dear Peter:

API is pleased to submit the attached information in support of EPA's reconsideration of the New Source Performance Standards ("NSPS") 40 C.F.R. Part 60 Subpart OOOOa, "Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources; Final Rule" 81 Fed. Reg. 32826 (June 3, 2016). Following publication of the rule, API recommended that the agency revisit the leak detection and repair survey frequencies for both well sites and compressor stations. To further support this recommendation, API initiated an analysis, described in the attached letter, following data collection from companies to determine how the implementation of current leak monitoring and repair programs might further inform a reduced leak survey frequency.

Please contact me with any questions regarding the content of this submittal. We look forward to the opportunity to review the data analysis and its conclusions with your staff.

Regards,

Matthew Todd
API
202.682.8319